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*Attorneys for Defendants Gloria Hallelujah Woods, Collipark Music, Inc.,
UMG Recordings, Inc., CMG Enterprises II Inc., and Foundation Entertainment, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALGERNOD LANIER WASHINGTON,
et al.,

Plaintiffs,

v.

GLORIA HALLELUJAH WOODS, *et*
al.,

Defendants.

Case No. 2:24-cv-09595-AH-PD

**STIPULATION FOR FILING OF
SECOND AMENDED COMPLAINT
AND SETTING RESPONSE
DEADLINES**

Complaint Filed: November 6, 2024
FAC Filed: December 30, 2024

STIPULATION

Plaintiffs Algernod Lanier Washington, Ronnel Levatte, World Music Group International, LLC, Brandon Crear, and Alexander Martin (“Plaintiffs”), on the one hand, and defendants Gloria Hallelujah Woods, UMG Recordings, Inc., CMG Enterprises II Inc., Foundation Entertainment, LLC, and Collipark Music, Inc. (together, the “Pryor Cashman-Represented Defendants” and collectively with Plaintiffs, the “Parties”), on the other hand, by and through their respective counsel of record submit the following stipulation:

WHEREAS, on November 6, 2024, Plaintiffs filed their initial complaint (the “Complaint”);

WHEREAS, in the Complaint, Plaintiffs inadvertently and incorrectly named certain entities, including Universal Music Group, Inc., a Delaware corporation (“UMGI”), “Interscope Records, Inc., a division of Universal Music Group, Inc., a Delaware corporation” (“IRI”), and Collective Music Group, LLC, a Tennessee limited liability corporation (“CMGLLC”), as defendants in this action;

WHEREAS, the parties stipulated to, and the Court granted, Plaintiffs leave to file a First Amended Complaint (“FAC”) by December 30, 2024, and gave the Pryor Cashman-Represented Defendants until January 31, 2025 to respond;

WHEREAS, on December 30, 2024, Plaintiffs filed their FAC;

WHEREAS, on January 22, 2025, counsel for the Pryor Cashman-Represented Defendants and Plaintiffs met and conferred pursuant to Local Rule 7-3 and this Court’s Standing Order via teleconference to discuss the Pryor Cashman-Represented Defendants’ contemplated motion to dismiss the FAC under Federal Rules of Civil Procedure 8, 12(b)(6) and 12(e);

WHEREAS, during the meet and confer, Plaintiffs stated that they believe that they can remedy by a pleading amending some or all of the deficiencies outlined by the Pryor Cashman-Represented Defendants during that meet and confer; and

1 WHEREAS, the Pryor-Cashman Represented Defendants consent to Plaintiffs
2 filing a Second Amended Complaint (an “SAC”) in an effort to remedy any deficiencies
3 that Plaintiffs can remedy by another pleading amendment;

4 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE
5 PARTIES,

6 1. Pursuant to Rule 15(a), Plaintiffs shall file their SAC by February 19, 2025;

7 2. Following service of the SAC, the Pryor Cashman-Represented
8 Defendants shall answer or otherwise respond to the SAC by the later of (a) 30 days
9 from such service and (b) March 3, 2025;

10 3. No Pryor Cashman-Represented Defendant need respond to the FAC as
11 the FAC will be amended.

12 Respectfully Submitted,

13
14 Dated: January 29, 2025

By: /s/ Benjamin S. Akley

PRYOR CASHMAN LLP

Benjamin S. Akley

Shamar Toms-Anthony

Attorneys for Defendants Gloria Hallelujah

Woods, Collipark Music, Inc., UMG

Recordings, Inc., CMG Enterprises II Inc., and

Foundation Entertainment, LLC

By: /s/ Angel Ransby

WALTER MOSELY

Walter Mosley, Esq.

Angel Ransby, Esq.

Laura Najera

Attorneys for Plaintiffs

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25 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories
26 listed, and on whose behalf this filing is submitted, concur in the filing’s content and
27 have authorized the filing.
28